

UNITED STATES DISTRICT COURT  
DISTRICT OF WYOMING

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2016 MAY -4 AM 10:58

UNITED STATES OF AMERICA,

Plaintiff,

v.

HILDA MIREYA IBARRA-AVILEZ,  
aka Hilda Ibarra-Perez,

Defendant.

CRIMINAL COMPLAINT

Case Number:

16M/36-F

STEPHAN HARRIS, CLERK  
CASPER

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about May 3, 2016, in the District of Wyoming, the Defendant, **HILDA MIREYA IBARRA-AVILEZ, aka Hilda Ibarra-Perez**, an alien who had previously been deported, was found to be intentionally in the United States, at Park County, Wyoming, the said Defendant having not obtained the consent of the Attorney General of the United States, or his successor, the Secretary of Homeland Security, to reapply for admission into the United States.

In violation of 8 U.S.C. §§ 1326(a)(1) and (2).

I further state that I am a Deportation Officer with the Immigration and Customs Enforcement and that this complaint is based on the following facts:

*(See attached Sworn Statement)*

Continued on the attached sheet and made a part hereof.

Signature of Complainant  
MICHAEL IBARRA

Sworn to before me and subscribed in my presence,

May 4, 2016

Date

at

Casper, Wyoming

City and State

HON. R. MICHAEL SHICKICH  
United States Magistrate Court Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

**SWORN STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT  
DEPORTATION OFFICER MICHAEL JHANDA  
U.S. v. HILDA MIREYA IBARRA-AVILEZ, A/K/A HILDA IBARRA-PEREZ**

1. I, Michael Y. Jhanda, am a Deportation Officer of the United States Department of Homeland Security, Immigration and Customs Enforcement (hereafter referred to as ICE), assigned to the Casper, Wyoming ICE office.

2. I have been employed as a Deportation Officer with the Enforcement and Removal Office in Casper, Wyoming since July 2012. I have over twenty five years' experience enforcing Immigration and Customs laws within the United States. I have successfully completed the Detention and Removal Operations Equivalency Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Based on my training and experience in the investigation of federal immigration laws and my investigation of the facts outlined below, I have reason to believe that **HILDA MIREYA IBARRA-AVILEZ aka: Hilda IBARRA-PEREZ** is unlawfully present in the United States after having been previously removed from the United States by ICE.

3. On May 3, 2016, your affiant was conducting an investigation within the District of Wyoming to locate **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez** based on information obtained from the ICE/ERO Office in Omaha, Nebraska in conjunction with the FBI Safe Streets Task Force. On May 3, 2016, **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez** was observed at 773 Road 12, Powell, Wyoming 82435 located in the jurisdiction of the District of Wyoming by an FBI Safe Streets Task Force officer. The Task Force officer was able to positively identify **HILDA MIREYA IBARRA-AVILEZ Aka Hilda Ibarra-Perez** as the same individual that was previously identified as a subject of interest in their investigation. Your affiant also provided a photo from **HILDA MIREYA IBARRA-**

**AVILEZ aka Hilda Ibarra-Perez's** deportation file from 2011 that assisted the Task force officer in positively identifying **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez**. The Task Force officer also stated that **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez** was previously seen that same day driving a Red Chevy pickup truck bearing the license plate number 11-26048. That vehicle registration came back to the address 773 Road 12, Powell, WY 82435. Your affiant conducted a search in the Consolidated Lead Evaluation and Reporting System (CLEAR) which indicated that **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez** registered a 2015 Ford Fusion on or about March 18, 2016, to the address 773 Road 12, Powell, WY 82435.

4. On May 4, 2016, your affiant reviewed documents received from the Alien Registration File 200 193 372, pertaining to **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez**. The documents included: 1) a copy of the Form I-860 (Notice and Order of Expedited Removal), dated June 4, 2011, ordering **HILDA MIREYA IBARRA-AVILEZ** be deported to Mexico; and 2) a government form I-296 (Notice to Alien Ordered Removed/Departure Verification) revealing **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez** had last been formally deported to Mexico at San Ysidro, California on June 4, 2011.

5. On May 4, 2016, your affiant reviewed the Computer Linked Application System (CLAIMS) database and found no record or indication that **HILDA MIREYA IBARRA-AVILEZ aka Hilda Ibarra-Perez** had applied to either the Attorney General of the United States or her successor, the Secretary of Homeland Security, for permission to re-enter the United States after having been formally removed.

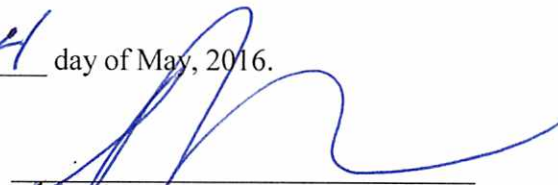
6. On May 4, 2016, your affiant reviewed the criminal history and the government form I-213 (Record of Deportable/Inadmissible Alien), related to **HILDA MIREYA IBARRA-AVILEZ** aka **Hilda Ibarra-Perez** which revealed no record of any criminal convictions.

**FURTHER YOUR AFFIANT SAYETH NOT**

**DATED** this \_\_\_\_ day of May, 2016.

  
\_\_\_\_\_  
**MICHAEL JHANDA**

Sworn and subscribed to before me this 4 day of May, 2016.

  
\_\_\_\_\_  
**Hon. R. Michael Shickich**  
United States Magistrate Court Judge

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**PENALTY SUMMARY**

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**DEFENDANT NAME:** **HILDA MIREYA IBARRA-AVILEZ,**  
**aka Hilda Ibarra-Perez**

**DATE:** May 4, 2016

**INTERPRETER NEEDED:** Yes

**PLACE OF TRIAL:** The government, pursuant to Rule 18, F.R.Cr.P., with due regard for the convenience of the Defendant, any victim and witnesses, and the prompt administration of justice, requests trial be held in:

**Cheyenne**

**VICTIM(S):** No

**OFFENSE/PENALTIES:** **8 U.S.C. §§ 1326(a)(1) and (2)**  
(Illegal Re-Entry of Previously Deported Alien into the United States)

0-10 Years Imprisonment  
Up To \$250,000 Fine  
3 Years Supervised Release  
\$100 Special Assessment

**AGENT:** Michael Jhanda, ICE

**AUSA:** Timothy J. Forwood, Assistant United States Attorney

**ESTIMATED TIME OF TRIAL:** 1 to 5 days

**WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE:** Yes

**ARE THERE DETAINERS FROM OTHER JURISDICTIONS:** ICE Detainer